

REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

Claims 9-14 have been amended. Support for the amendments is provided for example in the specification on page 10, lines 15-19, and page 11, lines 9-16. The amendments have been drafted to overcome the issues underlying the applied 35 USC 112, second paragraph, rejections. These amendments were not presented earlier due to the unforeseeability of the remarks presented in the Final Rejection.

Claims 9-14 were rejected, under 35 USC §103(a), as being unpatentable over Venkitaraman (US 2003/0185196) in view of Karoubalis (US 2005/0018637). To the extent these rejections may be deemed applicable to the amended claims, the Applicant respectfully traverses.

Claim 9 now defines a communication system having a mobility anchor point that issues first and second care-of addresses to a communication terminal apparatus and forwards data directed to a home address of the communication terminal apparatus to a destination indicated by the first and second care-of addresses, the latter care-of address being effective in adjacent cells across a boundary of two mobility anchor points. By forwarding data directed to a home address of a communication terminal apparatus to a destination indicated by both: (1) a second care-of address, which is effective in adjacent cells across a boundary of two mobility anchor points, and (2) a first care-of address, the claimed subject matter supports reducing the work load for a network, managing the communication terminal apparatus at the boundary of two mobility anchor points, and reducing the communication delay of forwarding packets to the

communication terminal as it transitions from one mobility anchor point to another (see specification page 6, line 23, through page 7, line 2). (References herein to the specification and drawings are for illustrative purposes only and are not intended to limit the scope of the invention to the referenced embodiments.)

Neither Venkitaraman nor Karoubalis discloses the claimed subject matter of a mobility anchor point issuing two care-of addresses to a communication terminal apparatus and forwarding data directed to a home address of the communication terminal apparatus to a destination indicated by the first and second care-of addresses. As acknowledged in the Final Rejection, Venkitaraman discloses that a mobile node communicates with only one access router at a time using a single care-of address associated with the access router (see Final Rejection page 4, lines 4-6, and Venkitaraman paragraph [0023], first sentence). Karoubalis discloses constructing a protocol stack such that a terminal can perform communication at a handover destination (see Karoubalis paragraph [0008], last three lines, and paragraph [0009], lines 1-7).

Accordingly, the Applicant respectfully submits that Venkitaraman and Karoubalis, considered individually or in combination, do not render obvious the subject matter now defined by claim 9. Independent claim 12 similarly recites the above-mentioned subject matter distinguishing apparatus claim 9 from the applied references, but with respect to a method. Therefore, allowance of claims 9 and 12 and all claims dependent therefrom is considered to be warranted.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

/James Edward Ledbetter/

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JEL/DWW/att

James E. Ledbetter
Registration No. 28,732

Attorney Docket No. 009289-05155
Dickinson Wright, PLLC
1901 L Street, N.W., Suite 800
Washington, D.C.
20036-3506
Telephone: (202) 457-0160
Facsimile: (202) 659-1559